

**THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LOCAL 25 S.E.I.U. WELFARE FUND,)	
LOCAL 25 S.E.I.U. & PARTICIPATING)	
EMPLOYERS PENSION TRUST,)	
)	
Plaintiffs,)	
)	
v.)	NO.07C 0362
)	
CHICAGO CONTRACT CLEANING)	Judge Norgle
AND SUPPLY CO., an Illinois Corp.,)	
)	Mag. Judge Schenkier
Defendant.)	

**MOTION TO VACATE ORDER OF DISMISSAL, TO REINSTATE ACTION,
AND FOR ENTRY OF JUDGMENT**

NOW COME the Plaintiffs and move this Honorable Court to vacate Order of Dismissal entered on August 2, 2007, a copy of which is attached hereto as Plaintiffs' Exhibit "A", and to reinstate Plaintiffs' cause of action instanter, and for entry of judgment against the Defendant.

In support of Plaintiffs' Motion, Plaintiffs state as follows:

- 1) That pursuant to Settlement Agreement, executed by the parties, a copy of which is attached hereto as Plaintiff's Exhibit "B," the parties agreed to a dismissal of the pending action.
- 2) That notwithstanding the provisions of the Settlement Agreement, specifically paragraph 2 thereof, the Defendant has failed to make current contributions for

the months of December 2007, through and including April 2008, and is delinquent in the total amount of \$188,633.38.

WHEREFORE, in accordance with the provisions of the Order of Dismissal, Exhibit "A", Plaintiffs pray that the Order of Dismissal be vacated instantler, Plaintiffs' cause of action be reinstated, and that judgment enter in favor of Plaintiffs and against the Defendant in the amount of \$246,633.38, as and for the outstanding delinquencies calculated pursuant to the Settlement Agreement, which amount includes current delinquencies due.

That Plaintiffs also pray that judgment enter for Plaintiffs' attorneys' fees and costs incurred as a result of the Defendant's non-compliance with the provisions of the parties' Stipulation to Dismiss.

/s/ Robert B. Greenberg
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Dated: June 11, 2008